Mr. James Roark
Reiter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206

Re: 089-12506
First Minor Permit Modification to:
Part 70 permit No.: T089-6629-00013

Dear Mr. Roark:

Reiter Automotive North America, Inc., was issued Part 70 operating permit T089-6629-00013 on June 16, 1999 for a stationary automotive sound deadening products manufacturing operation. An application to modify the source was received on July 26, 2000. Pursuant to 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as decribed in the attached Technical Support Document.

The modification consists of adding the following:

(a) One (1) Hot Mold Press identified as $HETT_3$, with steam assisted operational tools, a maximum capacity of 622 pounds of pads and 10.20 pounds of DOW films per hour, and exhausting to a stack identified as HV_1.

(b) One (1) cooling buck.

In addition to the new emission units, the source has submitted revised emission factors for the $HETT_1$ and $HETT_2$ Hot Mold Presses based on an evaluation of stack test emissions performed at the Lowell facility on July 30, 1999. The Technical Support Document for this minor source modification is attached to reflect the additional emission units (listed above) and the updated emission factors for $HETT_1$ and $HETT_2$.

The following construction conditions are applicable to the modification project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(I), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of

this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

7. Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

   (a) Visible emissions shall not exceed an average of twenty percent (20%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

   (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Teresa Kraus, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7854 to speak directly to Ms. Kraus. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

ERG/TK

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Air Compliance Section Inspector - Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Rieter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-6629-00013	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 16, 1999
1st Administrative Amendment 089-11497-00013 2nd Administrative Amendment 089-12125-00013	Issuance Date: November 24, 1999 Issuance Date: April 14, 2000
1st Minor Permit Modification 089-10909-00013	Pages Amended: 6, 6a, 31
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automotive sound deadening products manufacturing operation.

Responsible Official:	Jeff Windlow
Source Address:	101 West Oakley Street, Lowell, Indiana 46356-2206
Mailing Address:	101 West Oakley Street, Lowell, Indiana 46356-2206
Phone Number:	219-696-5100
SIC Code:	3714
County Location:	Lake
Source Location Status:	Severe Nonattainment Area of Ozone Attainment for all Criteria Pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-30, consisting of the following equipment:

(A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6.

(B) Thirteen (13) cooling bucks,

(C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units, and

(D) Three (3) mold presses, identified as HETT-1, and HETT-2, and HETT-3, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, all exhausting to stack HV-1.

(2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment.

(A) One (1) electric oven with maximum throughout of 669 pounds of foam sheet and KDA damper per hour.

(3) One (1) CJ Line, identified as CJ line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or the mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:

(A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven,

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(1) One (1) hot molding department identifed as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
   (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6.
   (B) Thirteen (13) cooling bucks, and
   (C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units.
   (D) Three (3) mold presses, identified as HETT-1, HETT-2, and HETT-3, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, all exhausting to stack HV-1.

(2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
   (A) One (1) electric oven with maximum throughout of 669 pounds of foam sheet and KDA damper per hour.

(3) One (1) CJ line, identified a CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum througput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
   (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven identified as FCU-15, and

(4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
   (A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
   (B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 61-2a) (Particulate Emission Limitations):

(A) The PM from the one (1) hot molding department shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit on pounds per hour
HMP-1, HMP-2, HMP-3, HETT-1, HETT-2, HETT-3/HV-1	70,467	003	18.12
HMP-1, HMP-2, HMP-3, HETT-1, HETT-2, HETT-3/HV-1	22,076	0.03	5.67
HMP-8, HMP-9/HV-3	54,083	0.03	13.90

(B) The PM from the one (1) foam part line shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit on pounds per hour

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Rieter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that Rieter Automotive North America, Inc., 101 West Oakley Avenue, Lowell, Indiana, 46356-2206, completed construction of the $HETT_3$ H mold press and one (1) cooling buck on in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on July 26, 2000 and as permitted pursuant to Permit No. 089-12506-00013 issued on _____

5. Additional (?operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit. (Delete this statement if it does not apply.)

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Rieter Automotive North America, Inc.**
Source Location:	**101 West Oakley Avenue, Lowell, Indiana 46356**
County:	**Lake**
SIC Code:	**3714**
Operation Permit No.:	**T 089-6629-00013**
Operation Permit Issuance Date:	**June 16, 1999**
Minor Permit Modification No.:	**089-12506-00013**
Permit Reviewer:	**ERG/TK**

The Office of Air Management (OAM) has reviewed a modification application from Rieter Automotive North America, Inc., relating to the construction of the following emission units and pollution control devices:

(a) One (1) Hot Mold Press identified as $HETT_3$, with steam assisted operational tools, a maximum capacity of 622 pounds of pads and 10.20 pounds of DOW films per hour, and exhausting to a stack identified as HV_1.

(b) One (1) cooling buck.

History

On July 21, 1998, Rieter Automotive North America, Inc., submitted an application to the OAM requesting that two (2) hot mold presses ($HETT_1$ & $HETT_2$), which were previously permitted (as HAM-10 and HAM-11) by an operational permit (OP-45-05-91-0460) issued on November 30, 1987, be relocated from a center cell of the hot mold department to the cold mold department. This application was incorporated into the Part 70 permit application. Rieter Automotive North America, Inc., was issued a Part 70 permit on June 16, 1999.

On July 26, 2000, an application to modify the source was received. The modification requested the addition of the $HETT_3$ Hot Mold Press and one (1) cooling buck. In addition to adding these units, the source submitted revised emission factors for the $HETT_1$ and $HETT_2$ Hot Mold Presses based on an evaluation of stack test emissions performed at the Lowell faciilty on July 30, 1999. The revised emission factors are shown in the calculations of this Technical Support Document (Appendix A).

Existing Approvals

The source was issued a Part 70 Operating Permit TO89-6629-00013 on June 16, 1999. The source has since received the following:

(a) First Minor Source Modification No.: 089-10909, issued on August 16, 1999

(b) First Administrative Amendment No.: 089-11497, issued on November 24, 1999

(c) First Significant Source Modification No.: 089-11823, issued on April 14, 2000

(d) Second Administrative Amendment No.: 089-12125, issued on April 14, 2000

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
HV_1*	Hot Mold Presses	52.0	5.0	22,076	200

*$HETT_1$, $HETT_2$, and $HETT_3$ Hot Mold Presses, as well as the cooling buck for each mold press, all vent to Stack HV_1.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 26, 2000.

Emission Calculations

The calculations submitted by the application have been verified and found to be accurate and correct. IDEM has reformatted these calculations into spreadsheets, which are provided in Appendix A of this document on (pages 1 and 2). These spreadsheets also reflect the change in emissions from $HETT_1$ and $HETT_2$ resulting from updated emission factors.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)*
PM	2.36
PM-10	0
SO_2	0
VOC	2.67
CO	0
NO_x	0

HAP's	Potential To Emit (tons/year)*
Phenol	0.55
Formaldehyde	0.55
TOTAL	1.10

*PTE includes only the addition of $HETT_3$ mold press and cooling buck.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(c)(1)(B) for processing exempt additions.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	severe nonattainment
CO	attainment
Lead	attainment

(a) Lake County has been classified as attainment or unclassifiable for CO, PM, PM-10, SO2, NO2 and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Federal Rule Applicability

(a) There are no New Source Performance standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) this source is a major source because it is a major source under 326 IAC 2-3 (Emission Offset).

326 IAC 2-3 (Emission Offset)

Pursuant to 326 IAC 2-3 (Emission Offset), this source is a major source because the potential volatile organic compound (VOC) emissions are greater than twenty-five (25) tons per year.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) for Line 6 & 7 and Line 8 on September 20, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visibility emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visibility emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - $HETT_3$ Hot Mold Press

326 IAC 2-3 (Emission Offset)

The proposed modification is not subject to 326 IAC 2-3 (Emission Offset), because the net emissions increase of volatile organic compounds (VOC) from the proposed source modification project with other net emissions increase from the source over a five (5) consecutive calendar year in a severe ozone nonattainment does not exceed twenty-five (25) tons per year, see Appendix A.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified)

This rule applies to the mold press because the source is located in a nonattainment county and has actual emissions of ten (10) tons or more particulate matter per year. Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified), facilities not limited by subsections (b) through (g) shall not allow or permit discharge to the atmosphere of any gases which contain particulate in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 gr/dscf).

SCFM = ACFM $T_{STP} * P_{ACTUAL} / T_{ACTUAL} * P_{STP}$
= 22,076 * (528R) / (468R) $P_{ACTUAL} = P_{STP}$
= 17,661 scfm

PM emissions = 0.03 gr./dscf * 17,661 scfm
= 0.03 gr./dscf * 17,661 scfm* (1 lb./7000 gr) * (60 min/1 hr)
= 4.54 lbs./hour
= 19.90 tons / year

Potential PM emissions are less than the allowable emissions. Therefore, the hot mold press complies with the rule.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

This rule does not apply to the proposed hot mold press because the press is new and does not have any baseline emissions even though the source has potential to emit 25 tons per year in Lake County.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities)

This does not apply to the mold press because the potential VOC emissions from the facility are less than 25 tons per year.

326 IAC 2-4.1-1 (New Source Toxic Control Rule)

The mold press ($HETT_3$) is not subject to 326 IAC 2-4.1-1 (New Source Toxic Control Rule), because the facility does not emit or have potential to emit (i.e., after control) ten (10) tons per year or more of any hazardous air pollutant or twenty-five (25) tons of any combination of hazardous air pollutants which are listed in Section 112(b) of the Clean Air Act.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Proposed Changes

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-30, consisting of the following equipment:

(A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6.

(B) **Thirteen (13)** ~~Twelve (12)~~ cooling bucks,

(C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units, and

(D) **Three (3)** ~~Two (2)~~ mold presses, identified as HETT-1**,** ~~and~~ HETT-2, **and HETT-3**, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, **all** ~~both~~ exhausting to stack HV-1.

(2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment.

(A) One (1) electric oven with maximum throughout of 669 pounds of foam sheet and KDA damper per hour.

(3) One (1) CJ Line, identified as CJ line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or the mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:

(A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven,

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Permit Modification No. 089-12506-00013.

Appendix A: Emission Calculations
HETT 1, HETT 2, & HETT3*
Company Name: Rieter Automotive North America, Inc.
Address City IN Zip: 101 West Oakley Ave., Lowell, IN 46356
CP: 089-12506-00013
Plt ID: 00013
Reviewer: ERG/TK
Date: August 14, 2000

Pollutant	Press Emission Factor (lb/lb)	Tool Emission Factor (lb/lb)	Maximum Capacity (lb/hr)	Uncontrolled Press Emissions (lb/hr)			Uncontrolled Tool Emissions (lb/hr)			Uncontrolled Fugitive Press Emissions (lb/hr)		
				HETT1	HETT2	HETT3	HETT1	HETT2	HETT3	HETT1	HETT2	HETT3
PM	5.12E-04	3.41E-04	632	0.3074	0.3074	0.3074	0.2155	0.2155	0.2155	0.0154	0.0154	0.0154
VOC	3.41E-04	6.25E-04	632	0.2047	0.2047	0.2047	0.3950	0.3950	0.3950	0.0102	0.0102	0.0102
Phenol	0.00E+00	1.99E-04	632	0.0000	0.0000	0.0000	0.1258	0.1258	0.1258	0.0000	0.0000	0.0000
Formaldehyde	0.00E+00	1.99E-04	632	0.0000	0.0000	0.0000	0.1258	0.1258	0.1258	0.0000	0.0000	0.0000

Capture Efficiencies:

Tool:	100%
Press:	95%
Fugitive from Press:	5%

	Emissions from Each Hot Mold		
Pollutant	HETT1	HETT2	HETT3
PM	2.3577	2.3577	2.3577
VOC	2.6717	2.6717	2.6717
Phenol	0.1258	0.5509	0.5509
Form	0.1258	0.5509	0.5509

Pollutant	Potential Emissions for this modification - HETT3 only (tons/year)
PM	2.36
VOC	2.67
Phenol	0.55
Form	0.55

**Potential emissions from HETT1 and HETT2 are shown only to reflect the potential emissions using the revised emission factors submitted in the application; they are not included with the potential emissions for this modification (i.e., adding the HETT3 hot mold press).

Methodology:

*Total Potential Emissions include emissions from stack HV1. The HETT1, HETT2, and HETT3 Hot Mold Presses, as well as the corresponding cooling bucks all vent to stack HV1.

Emissions factors for the HETT1, HETT2, & HETT3 are from test results provided by the source.

Uncontrolled Press Emissions (lb/hr) = Press EF (lb/lb) * Maximum Capacity (lb/hr) * Capture Efficiency

Uncontrolled Tool Emissions (lb/hr) = Tool EF (lb/lb) * Maximum Capacity (lb/hr)

Uncontrolled Fugitive Press Emissions (lb/hr) = HETT1 + HETT2 + HETT3 Uncontrolled Emissions (lb/hr) * Fugitive Capture Efficiency

Potential Uncontrolled Emissions = HETT1, HETT2, & HETT3 Uncontrolled Press and Tool Emissions (lb/hr) + Fugitive Uncontrolled Emissions (lb/hr)

Total Potential Emissions (tons/year) = Uncontrolled Emissions (lb/hour) * 24 hrs/day * 365 day/yr * 1 ton/2000 lb

Appendix A: Emission Calculations
Net Emissions Increases Over a Five Year Period
Company Name: Rieter Automotive North America, Inc.
Address City IN Zip: 101 West Oakley Ave., Lowell, IN 46356
CP: 089-12506-00013
Plt ID: 00013
Reviewer: ERG/TK
Date: August 14, 2000

Permit #	Date of Issue	Status	Equipment Covered	Potential Emissions in Tons per Year PM	VOC	NOx	CO
089-4719-00013	09/26/95	Registration	Steam Boiler NAVA Curing Oven*	0.200	0.000	3.300	1.000
089-4774-00013	11/06/95	Registration	Added Foam Part Line Consisting of Electric Oven	3.900	4.200	0.000	0.000
089-5604-00013	07/30/96	CP	200 HP Fire Pump, #1 Diesel Fuel**	0.110	0.130	4.410	0.330
089-8167-00013	05/05/97	Registration	New Equipment to Modify Line 6&7	0.020	0.420	0.130	0.030
089-8353-00013	09/08/97	Exemption	Foam Part Cell to produce molded polyurethane	0.000	0.330	0.000	0.000
089-9967-00013	11/28/98	Registration	HETT Presses # 1 & # 2***	4.715	5.343	0.000	0.000
089-10909-00013	08/16/99	Minor Source Mod to TV Permit	Line 91 Thermal Oxidizer****	0.000	0.200	3.910	4.000
			New Emisions from NH ->NOx*****			6.130	
089-4774-00013	11/06/99	Registration	Closed Foam Part Line Consisting of Electric Oven	-3.900	-4.200	0.000	0.000
089-12506-00013	Current Application	Minor Source Mod to TV Permit	Addition of HETT Press #3	2.357	2.672	0.000	0.000
Total Contemporaneous Increases and Proposal Project				**7.40**	**9.10**	**17.88**	**5.36**

*Removed 9.0 MMBtu/hr conventional oven; net VOC are considered in above table.

**Potential to Emit (PTE) of the fire pump is limited based on an enforceable limitation on fuel usage (1,199 gallons of fuel per month) which was included in CP: 089-5604-00013. Emissions calculated using emission factors for diesel engines found in AP-42, Chapter 3.3.

***PTE based on revised emission factors from stack test results submitted by the applicant in current application (089-12506-00013).

****Potential emissions from the thermal oxidizer (TO) are based on AP-42 emission factors and an alternate emission factor for NOx of 1.26 lb/hr proposed by the applicant based on stack testing. The emissions reflected in the table are net emissions and account for the decrease in combustion emissions from the removal of the old TO (3.7 MMBtu/hr - 1.6 tons/yr NOx reduction).

*****Based on revised NOx emission rate information submitted by the applicant, the potential emissions from the thermal oxidizer exempted in CP 089-9217-00013 should have accounted for the increased flow of NH4 which resulted from the ductwork changes. This increased NH4 loading to the TO will result in increased NOx emissions from this process. The increase in NOx emissions from the duct work modifications is 1.40 lbs/hr (6.13 tons/yr) and has been added as emissions for the project.

Note:

The following approvals have not been included in this analysis for the following reasons:

(a) CP-089-4301-00013, 089-4461-00013, 089-4717-00013, 089-4718-00013, 089-4720-00013: Facilities were actually constructed and operated prior to the contemporaneous period.

(b) CP-089-6837-00013: Modifications to Line 92 were never constructed or operated.

(c) CP-089-5242-00013, 089-5351-00013, 089-4642-00013: Administrative Amendments.

(d) CP-089-4774-00013: Foam Part Line was removed 11/99.